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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re)	Chapter 11 Case
)	
DELPHI CORPORATION, <i>et al.</i>)	No. 05-44481
)	
Debtors.)	(Jointly Administered)
)	

**RESPONSE OF AUTOCAM CORPORATION AND SAGER
PRECISION TECHNOLOGIES, INC. TO DEBTORS'
(I) THIRD OMNIBUS OBJECTION (SUBSTANTIVE)
PURSUANT TO 11 U.S.C. § 502(b) AND FED. R. BANKR. P. 3007
TO CERTAIN (A) CLAIMS WITH INSUFFICIENT DOCUMENTATION,
(B) CLAIMS UNSUBSTANTIATED BY DEBTORS' BOOKS AND
RECORDS, AND (C) CLAIMS SUBJECT TO MODIFICATION
AND (II) MOTION TO ESTIMATE CONTINGENT AND
UNLIQUIDATED CLAIMS PURSUANT TO 11 U.S.C. § 502(c)**

Autocam Corporation and Sager Precision Technologies, Inc. (collectively, "Autocam"), by and through its undersigned counsel, hereby file this response (the "Response") to the Debtors' (I) Third Omnibus Objection (Substantive) Pursuant to 11 U.S.C. § 502(B) and Fed. R. Bankr. P. 3007 to Certain (A) Claims with Insufficient Documentation, (B) Claims Unsubstantiated by Debtors' Books and Records, and (C) Claims Subject to Modification and (II) Motion to Estimate Contingent and Unliquidated Claims Pursuant to 11 U.S.C. § 502(c) (the "Third Omnibus Objection"). In support of its response, Autocam states as follows:

BACKGROUND

1. Prior to the Petition Date (as defined below), Autocam supplied the Debtors (as defined below) with various goods and related services.

2. On October 8, 2005 (the "Petition Date"), Delphi Corporation and several of its affiliates (collectively, the "Debtors") filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code").

3. After Autocam timely filed proofs of claims (the "Claims"), Autocam and the Debtors agreed to resolve all outstanding prepetition claims against the Debtors by Autocam and its affiliates and vice versa pursuant to an assumption agreement (the "Assumption Agreement") in accordance with this Court's Assumption Procedures Order.

4. On or about November 1, 2006, the Debtors filed the Third Omnibus Objection seeking to reduce the Claims because it is unsubstantiated.

5. Autocam has no objection to the Claims being expunged, so long as the Claims will be reallowed in the event that the Debtors do not satisfy their obligations under the terms of the Assumption Agreement. Therefore, in an abundance of caution, Autocam objects to the disallowance of the Claims.

MEMORANDUM OF LAW

6. This Response sets forth specific responses with supporting law divided under numerous paragraphs. Autocam respectfully requests that the requirements of the service and filing of an answering memorandum of law under Local Rule 9013-1(b) of the Local Rules for the United States Bankruptcy Court for the Southern District of New York be deemed satisfied.

WHEREFORE, Autocam objects to the relief requested in the Third Omnibus Objection as it relates to Autocam to the extent that the Debtors do not satisfy their obligations under the Assumption Agreement and respectfully requests that the Court (i) overrule the objection, and (ii) allow the Claims pending the Debtors' satisfaction of its obligations under the Assumption Agreement, and (iii) grant such other and further relief as the Court may deem appropriate under the circumstances.

Dated: November 22, 2006

Respectfully submitted,

**AUTOCAM CORPORATION AND
SAGER PRECISION TECHNOLOGIES,
INC.**

By: /s/John T. Gregg
One of its Attorneys

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